

North Shore Gas Company 200 East Randolph Street Chicago, IL 60601 www.northshoregasdelivery.com

July 24, 2017

Mr. Ross del Rosario Remedial Project Manager USEPA Region 5 – SR6J 77 W. Jackson Boulevard Chicago, Illinois 60604-3590

RE:

2017 Annual Progress Report and Master Schedule Update
North Shore Gas Company's Former Manufactured Gas Plant Sites

CERCLA Docket No.: V-W-07-C-877

Dear Mr. del Rosario,

Enclosed is the 2017 Annual Progress Report and Master Schedule Update for the North Shore Gas Company's (NSG) two former manufactured gas plant (MGP) sites in Waukegan, Illinois:

- North Plant
- South Plant

This 2017 Annual Progress Report summarizes the activities performed between July 23, 2016 and July 22, 2017 at these sites and provides a proposed schedule for future activities. It has been prepared in accordance with Task 8, Subtask 8.2, of the Statement of Work attached to the Settlement Agreement and Administrative Order on Consent between the United States Environmental Protection Agency (USEPA) and NSG, effective July 23, 2007.

If you have any questions regarding this document, please don't hesitate to contact me at (312) 240-4569 or nmprasad@integrysgroup.com.

Regards,

Naren M. Prasad, P.E., MPH

Principal Engineer - Environmental

Enclosures as noted

cc:

Brian Bartoszek, Bob Greco – WEC (email only)

Paul Lake – IEPA (hard copy and email)

Jennifer Hagen - NRT

Dave Klatt - CH2MHill (email only)











OBG | There's a Way

July 24, 2017

**Mr. Naren Prasad WEC Business Services, LLC**200 East Randolph Drive, 21<sup>St</sup> Floor
Chicago, IL 60601

Subject: 2017 Annual Progress Report and Master Schedule Update

North Shore Gas Company's Former Manufactured Gas Plant Sites

CERCLA Docket No.: V-W-07-C-877

NRT Project No. 1982

Dear Mr. Prasad:

Please find attached the 2017 Annual Progress Report and Master Schedule Update for North Shore Gas Company's (NSG) former manufactured gas plant (MGP) sites. These reports have been combined to summarize activities performed between July 23, 2016 and July 22, 2017 and a proposed schedule for future activities.

This 2017 Annual Progress Report and Master Schedule Update has been prepared in accordance with Task 8, Subtask 8.2 and Exhibit A, Part C, respectively, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and NSG, effective July 23, 2007.

Please do not hesitate to contact the undersigned if you have any questions regarding this document.

Sincerely,

NRT | An OBG Company

**Jennifer M. Hagen, Pl** Principal Engineer

Attachments: As noted above

For distribution to: Mr. Ross delRosario, USEPA (email)

Mr. Paul Lake, IEPA (hard copy and email)

Mr. Dave Klatt, USEPA's Contractor, CH2MHill (email)







# **OBG**

# 2017 Annual Progress Report and Master Schedule Remedial Investigation/Feasibility Study North Shore Gas Company Former Manufactured Gas Plant Sites CERCLA V-WZ-07-C-877

**WEC Business Services, LLC** 

July 24, 2017 NRT Project No. 1982



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Figure 1 Master Schedule

#### **ACRONYMS AND ABBREVIATIONS**

AOC Administrative Settlement Agreement and Order on Consent

ARAR Applicable or Relevant and Appropriate Requirements

BMc Burns and McDonnell

CSM Generalized Conceptual Site Model

CD Consent Decree

DNAPL Dense Non-Aqueous Phase Liquid

FS Feasibility Study
FSP Field Sampling Plan
HASP Health and Safety Plan

IEPA Illinois Environmental Protection Agency

MGP Manufactured Gas Plant

NRT Natural Resource Technology, Inc., an OBG Company

NSG North Shore Gas Company

QAPP Quality Assurance Project Plan
RAF Risk Assessment Framework
RSL Regional Screening Level
RI Remedial Investigation

RNA Remedial Natural Attenuation
RPM Remedial Project Manager

Settlement Administrative Settlement Agreement and Order on Consent for Remedial

Agreement Investigations and Feasibility Studies

SOW Statement of Work

SSWP Site Specific Work Plans

USEPA U.S. Environmental Protection Agency

WBS WEC Business Services, LLC

#### 1 INTRODUCTION

#### 1.1 SCOPE

This Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2 of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the U.S. Environmental Protection Agency (USEPA) and North Shore Gas Company (NSG), effective July 23, 2007. Also, included herein is a Master Schedule Update that includes the general schedule for Remedial Investigation/Feasibility Study activities at each Site. The Annual Progress Report and Master Schedule Update address NSG's two former manufactured gas plant (MGP) Sites located in Waukegan, Illinois (North Plant MGP and South Plant MGP). WEC Business Services, LLC (WBS) manages the NSG sites for WEC Energy Group.

#### 1.2 OVERVIEW

This report addresses the following:

- Section 2: Multi-Site Document Progress
- Section 3: Site Progress
- Section 4: Proposed Master Schedule
- References

#### 2 MULTI-SITE DOCUMENTS

Under the Settlement Agreement and SOW, Multi-Site documents are used to set forth general approaches and concepts to streamline subsequent site-specific work plans and minimize review times. The Multi-Site Remedial Investigation (RI) documents are used to maintain a consistent approach to investigate and assess potential risk at each site. The Multi-Site Feasibility Study (FS) Support Documents are used to develop general response actions and technologies appropriate for MGP sites.

This section summarizes the status of the Multi-Site Documents.

#### 2.1 MULTI-SITE RI DOCUMENTS

USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and

September 8, 2008 and subsequent addenda. The Multi-Site RI Documents set forth a consistent approach for WEC Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include:

- Multi-Site Quality Assurance Project Plan Revision 2, September 4, 2007 (QAPP, 2007(c))
  - » Updated Laboratory Usage and Qualification Addendum Test America, submitted for Peoples Gas Light and Coke Company's (PGL) Former Crawford Station MGP on May 7, 2012
  - » QAPP Worksheet #28, submitted with response to comments on Site-Specific Work Plan (SSWP), Addendum No. 1, for PGL Division Street Station Former MGP on March 12, 2012
- Multi-Site Health and Safety Plan Revision 2, August 2, 2007 (HASP, 2007(a))
- Generalized Conceptual Site Model Revision 0, August 5, 2007 (CSM, 2007(b))
- Multi-Site Risk Assessment Framework (RAF) Revision 0, September 5, 2007 (RAF, 2007(d))
  - » Multi-Site RAF Addendum, April 20, 2011
  - » Multi-Site RAF Addendum Revision 1, March 28, 2013
  - » Multi-Site RAF Addendum Revision 2, February 17, 2014 (approved March 10, 2014)
  - » Multi-Site RAF Addendum Revision 3, July 30, 2014
  - » Multi-Site RAF Addendum Revision 4, April 4, 2016
  - » Multi-Site RAF Addendum Revision 5, September 13, 2016
- Multi-Site Field Sampling Plan (FSP) Revision 4, September 8, 2008 (FSP, 2008(a))
  - » SAS-12-01 Revision 1, December 2012, approved January 22, 2013
  - » SAS-11-06, SAS-11-01, and SAS-11-04 Revisions 1 and SAS-05-05 Revision 3, May 28, 2014, approved July 24, 2014

The Multi-Site RAF Addendum submitted to USEPA on April 20, 2011 (prepared by Exponent, 2011(a)) incorporates the USEPA's Regional Screening Levels (RSL) for Chemical Contaminants at Superfund Sites, www.epa.gov/region/superfund/prg/index.html) for Regions 3, 6, and 9 into the hierarchy for human health screening levels and further develops the approach to assessing potential vapor intrusion issues. Subsequent Multi Site RAF Addenda incorporate updates to RSLs which are revised approximately every six months. Not all RSL updates result in a RAF Addenda. For instance, the November 2014 RSL update did not modify RSLs for the MGP constituents of potential concern (COPCs). As part of the RAF Addendum Revision 2, it was acknowledged the RSLs may be modified based on the semi-annual updates, if any, and does not require a formal submittal. In other words, the most current RSLs at the time will be used for comparison of site media.

A Vapor Intrusion (VI) Decision Matrix for the Multi-Site Former MGP Sites was initiated as part of an August 5, 2015 meeting. USEPA provided comments on October 23, 2015 and responses to comments were submitted November 23, 2015. Additional UEPA comments were received December 17, 2015, responses to comments were submitted January 18, 2016 and USEPA approved the VI Decision Matrix on February 10, 2016.

Site-Specific Work Plans (SSWP) are based on the Multi-Site documents and include modifications, as necessary, to reflect site-specific conditions. For instance, the site-specific CSM discusses the pathways presented in the Generalized CSM and why or why not the pathway is carried through into the baseline risk assessment.

#### 2.2 MULTI-SITE FS SUPPORT DOCUMENT

USEPA has approved (USEPA, 2010(g)) the Multi-Site FS Support Document dated March 26, 2010 (FS Support Document, 2010(f)). The Multi-Site FS Support Document includes general response actions and preliminary remedial technologies.

SOW Section 1.2.2 discusses the Multi-Site FS Support Document which includes:

- Preliminary Remedial Technology Screening
- Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (ARARs)
- Preliminary Permitting/Equivalency Requirements

Site-Specific FS evaluations and the Detailed Analysis of Alternatives (FS Report) for each site are based on the Multi-Site FS Support Document. In addition, USEPA's comments on FS related documents for North Shore Gas Company (NSG) South Plant MGP and WPSC's Manitowoc MGP are incorporated into each FS. Major deviations from the FS Support Document include providing individual remedial options for each media to be assembled by USEPA (not assembling remedial alternatives) for the Site as a whole and providing volumes/cost estimates for each of three cancer risk ranges (10-6, 10-5, and 10-4).

On November 5, 2015, USEPA revised the request for individual remedial options and required assembled remedial alternatives for the WPSC Marinette Site. It is assumed this request will carry forward with the NSG sites.

#### 2.3 MULTI-SITE DOCUMENT STATUS

Additional revisions to Multi-Site Documents have not been required.

Multi-Site RAF Addendum, Revision 6, is anticipated to be submitted in August 2017 to document the May 2017 RSL updates.

#### 2.4 MULTI-SITE MEETINGS

Multi-Site technical meetings were not required during this reporting period.

Site specific meetings were held, as discussed in Section 3.

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#### 3 SITE PROGRESS

Project start dates and site prioritization for RI/FS activities were established for both sites in Exhibit A, Section A, of the SOW. The South Plant MGP Site was initiated July 23, 2007, coinciding with the effective date of the Settlement Agreement. The North Plant MGP Site was to be initiated seven months following the effective date (February 23, 2008) but was re-established to September 26, 2008.

A separate AOC for Remedial Design of an Interim Remedy (V-W-15-C-027) and was executed on September 24, 2015, with an effective date of October 5, 2015. A Consent Decree (Civil Action No. 16-10672) for the interim remedy was executed on November 16, 2016.

The Annual Progress Report is intended to provide a concise summary of the work completed at each MGP site. Site progress is discussed herein.

#### 3.1 SOUTH PLANT MGP SITE

The Project Start Date for the South Plant MGP Site coincided with the effective date of the Settlement Agreement (July 23, 2007). Per the SOW, scoping meetings and conference calls may be used to discuss the content of South Plant MGP Site site-specific documents. No project meetings were held with respect to the RI/FS during this reporting period.

On July 30, 2015 USEPA issued an Interim Record of Decision (ROD) to address dense non-aqueous phase liquid (DNAPL) recovery in advance of a site-wide remedy. Informal discussions regarding access issues and the Interim Remedy schedule were held throughout this reporting period. No formal project meetings were held with respect to the Interim Remedy during this reporting period.

#### 3.1.1 Planning Documents and Work Plan Submittals

RI/FS planning documents and work plan submittals were not completed during this reporting period while advancing the Interim Remedy.

Interim Remedial Design activities, as described in the following USEPA-approved documents: Settlement Agreement and Administrative Order on Consent for Remedial Design at the North Shore Gas South Plant Site in Waukegan, Illinois (USEPA, October, 2015), Remedial Design Work Plan – Revision 1 (NRT January 2016), and Pre-Design Investigation Work Plan – Revision 1, (NRT June, 2016), are complete and summarized in the following table.

Deliverable or Milestone	Completion Date	USEPA Comments Received
Project Start Date	October 5, 2015	
Receive Final Administrative Settlement Agreement	October 5, 2015	
and Order on Concern for Remedial Design (Interim)		
Submit Draft Interim Remedial Design Work Plan	November 18, 2015	December 11, 2015
Submit Response to USEPA's December 11, 2015	January 11, 2016	February 9, 2016
Comments and Final Interim Remedial Design Work		(approved)
Plan		
Submit Pre-Design Investigation Work Plan	April 11, 2016	May 19, 2016
Submit Pre-Design Investigation Work Plan – Revision 1	June 17, 2016	June 23, 2016
		(approved)

#### 3.1.2 Remedial Investigation Field Activities

Dense Non-Aqueous Phase Liquid (DNAPL) recovery efforts and RI field activities performed at the South Plant MGP Site during this progress report period, as described in the following USEPA-approved documents: SSWP (BMc, September 2008(b)), the Modified Monitoring Well Parameters and Well Network Technical

Memorandum, (NRT, April 2010(h)), and the letter to USEPA to Modify the Groundwater Sampling Schedule (going to semi-annual events (NRT, 2011(e)) are summarized in the following table.

Task	Completion Date
Second Semi-Annual 2016 Groundwater Sampling Event	September 19-21, 2016
First Semi-Annual 2017 Groundwater Sampling Event	March 20-22, 2017
	August 11, 2016
Dense Non-Aqueous Phase Liquid (DNAPL) Recovery	October 5, 2016
	December 1, 2016
	January 25, 2017
	March 22, 2017

Interim Remedial Design activities were limited due to third party access agreements. Activities completed during this reporting period are summarized in the following table.

Task	<b>Completion Date</b>
Soil borings in a limited area within the footprint of Waukegan Port District's proposed new building	August 8-15, 2016
Execute third party access agreements to implement Pre-Design Investigation Work Plan – Revision 1	June 2017

#### 3.1.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
July 2016	August 15, 2017
August 2016	September 14, 2017
September 2016	October 14, 2017
October 2016	November 14, 2017
November 2016	December 12, 2017
December 2016	January 16, 2017
January 2017	February 14, 2017
February 2017	March 14, 2017
March 2017	April 12, 2017
April 201	May 15, 2017
May 2017	June 15, 2017
June 2017	July 14, 2017

#### 3.2 NORTH PLANT MGP SITE

The Project Start Date for the North Plant MGP Site was established in Exhibit A, Section A, of the SOW, to be seven months after the effective date of the Settlement Agreement (July 23, 2007), which was February 23, 2008 but was re-established to September 26, 2008.

NSG and USEPA entered into a Time-Critical AOC on April 8, 2013 to address portions of the site with MGP residuals at the surface. The Time Critical Removal proceeded under AOC V-W-13-C-009 and is complete per USEPA's May 29, 2015 approval of the Remedial Action Completion Report, dated January 20, 2015.

Informal calls regarding third party property access negotiations were held throughout the reporting period. Project meetings, conference calls, or emails are summarized in the following table.

Торіс	Meeting Date
Emails regarding DNAPL observations at MW-19D	July 13, 2016 July 18, 2016 June 29, 2017 July 6, 2017
Meeting regarding USEPA's September 1, 2016 Site-Specific Work Plan Addendum No. 1 – Revision 0 Comments and scope of Revision 1	December 1, 2016

#### 3.2.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table, compared against the anticipated completion date, established in the 2016 Annual Progress Report and Master Schedule Update (NRT, 2016(g)).

Task/Submittal	Targeted Completion Date <sup>1</sup>	Actual Completion Date	USEPA Comments Received
Submit Site-Specific Work Plan Addendum No. 1 – Revision 0	2	August 11, 2016	September 1, 2016
Respond to USEPA's September 1, 2016 comments on SSWP Addendum No. 1-Revision 0	October 2016	October 26, 2016	December 12, 2016
Respond to USEPA's December 12, 2016 comments on SSWP Addendum No. 1 – Revision 0; Submit Revision 1	January 2017	January 20, 2017	February 1, 2017
Respond to USEPA's February 1, 2017 comments on SSWP Addendum No. 1 – Revision 1	February 2017	February 14, 2017	April 19, 2017 (approval)
Submit RI Report – Revision 0	February 2, 2018 <sup>3</sup>		

- 1. Target Completion dates as established in the 2016 Annual Progress Report and Master Schedule Update, NRT 2016(g) or the monthly progress reports.
- 2. A formal submittal was not included in the 2016 Annual Progress Report and Master Schedule Update, NRT 2016 (g).
- 3. Assumed supplemental field work would be completed in March 2017 and new groundwater monitoring wells were sampled two times in June and September 2017. Additional data needs have been identified which require third party property owner access agreements. Site access was not attained and supplemental field work was not completed, therefore, the RI Report Revision 0 was not submitted.

#### 3.2.2 Remedial Investigation Field Activities

RI field activities performed at the North Plant MGP Site during this progress report period, as described in the USEPA-approved SSWP – Revision 2 (NRT, 2001(d)), are summarized in the following table. Please note sediment sampling in the former tar pit was included in the USEPA-approved SSWP; however, this area has been remediated through the Time Critical Removal and is no longer required.

Third party access agreements are in progress to facilitate implementation of the SSWP Addendum No. 1 – Revision 1.

Task	Completion Date
Quarterly RI Groundwater Sampling Events	September 19-20, 2016 December 19-21, 2016 March 13-15, 2017 June 26-28, 2017

#### 3.2.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
July 2016	August 15, 2017
August 2016	September 14, 2017
September 2016	October 14, 2017
October 2016	November 14, 2017
November 2016	December 12, 2017
December 2016	January 16, 2017
January 2017	February 14, 2017
February 2017	March 14, 2017
March 2017	April 12, 2017
April 201	May 15, 2017
May 2017	June 15, 2017
June 2017	July 14, 2017

#### 4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW includes a schedule for major deliverables. RI field work, as described in the approved SSWP – Revision 1, September 12, 2008, (BMc 2008(b)), has been completed at the South Plant MGP Site and the RI Report – Revision 1 Modified, dated January 10, 2014 has been approved on January 22, 2014. An interim remedy to address the presence of non-aqueous phase liquid (DNAPL) is in the pre-design investigation/investigation phase. The site-wide FS Report will be re-initiated following completion of the interim remedy. North Plant MGP SSWP – Revision 2 was submitted November 29, 2011 and was approved March 20, 2012. The TCRA was completed as described in the USEPA-approved January 20, 2015 Construction Completion Report. Supplemental RI field activities have been identified and approved and are in the field planning phase, following access agreements.

Future submittals and activities are dependent on USEPA comments and approvals. The site-specific schedules for both sites, as currently understood, are updated herein to provide proposed site-specific schedules for field activities and major deliverables.

#### 4.1 OVERVIEW PROGRESS MEETINGS

Monthly Progress Reports are submitted for each site.

Overview progress meetings are proposed to be conducted on an as-needed. Specific progress meeting dates are not proposed at this time but are anticipated following collection of additional site data.

#### 4.2 MULTI-SITE RI DOCUMENTS

The Multi-Site Documents, as described in the SOW, have been completed and approved as summarized in Section 2. Additional modifications or updates, primarily anticipated to be RAF Addendum, will be prepared as needed (i.e., RAF Addendum 6 is anticipated in August 2017).

#### 4.3 SCHEDULE FOR NSG SITES

Figure 1 summarizes the proposed target dates for the Interim Remedy at South Plant and the RI/FS activities at North Plant. Proposed target dates have been adjusted to reflect anticipated RI field activities, progress to date, USEPA approvals and reasonably anticipated approvals. All site schedules are dependent on USEPA approval dates, weather, access, and sampling/construction seasons.

Figure 1 considers the deliverable timeframes specified in Exhibit A of the SOW (e.g., finalize submittals within 45 days from receipt of USEPA comments). For planning purposes, it is assumed USEPA will generally provide comments within 60 days of submittals. The schedule also includes modifications to the AOC/SOW, per the July 9, 2015 modifications for Alternative Array and FS Revision 0 documents, as discussed in the June 17, 2015 meeting.

The proposed schedules are subject to change. Modifications to the schedule, if necessary, will be communicated to USEPA through monthly site-specific progress reports, weekly progress conference calls during RI activities, or other communications.

#### 4.3.1 South Plant MGP Site

Groundwater sampling activities will continue to be performed at the South Plant MGP Site during the next progress report period, as described in the following USEPA-approved documents: SSWP (BMc, September 2008(b)), the Modified Monitoring Well Parameters and Well Network Technical Memorandum, (NRT, April 2010(h)), and the letter to USEPA to Modify the Groundwater Sampling Schedule (going to semi-annual events (NRT, 2011(e)) and are summarized in the following table.

As discussed is Section 3.1.1, USEPA has issued an Interim Remedy ROD which addresses DNAPL recovery in advance of a site-wide remedy. The Interim Remedy is in the pre-design investigation/design phase and will be

followed by approximately 7 years of DNAPL recovery prior to re-evaluating site conditions and appropriate site-wide remedial actions, if deemed necessary.

Elements of the Interim Remedial Action tasks and on-going post RI groundwater monitoring are presented in Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 <sup>th</sup> of every month
Semi Annual Groundwater Sampling Events	March and September
Pre-Design Investigation Field Activities	September through October 2017
Compatibility Testing	October 2017 through February 2018
Compatibility resting	(assumes pre-design investigation completed in October 2017)
Submit Preliminary Design Package	Spring 2018
to USEPA	(assumes pre-design investigation and compatibility testing completed in
to OSEPA	February 2018)
Submit Pre-Final Design Package to	Summer 2018
USEPA	(assumes USEPA comments on Preliminary Design in Spring 2018)
Submit Final Design Package to	Fall 2018
USEPA	(assumes USEPA comments on Pre-Final Design Package in Fall 2018)
	Winter/Spring 2019
Initiate Interim Remedy	(assumes USEPA approves Final Remedial Design in Fall/Winter 2018 and
·	contractor procurement and permitting completed in Winter 2019)
Supplemental Groundwater and Soil	Summer 2027
Assessment	(assumes Interim Remedy operates seven years)
Update RI Report/Site-Wide FS	Spring 2028
Report	(assumes a combined report)

#### 4.3.2 North Plant MGP Site

The North Plant MGP SSWP – Revision 2 was submitted November 29, 2011 (NRT, 2011(d)) was approved March 20, 2012. A SSWP Addendum No. 1 – Revision 1 was submitted January 20, 2017 and approved April 19, 2017 with responses to USEPA's February 1, 2017 comments, dated February 14, 2017. Additional RI activities have been proposed for property that was not included in the TCRA. Major deliverable and activity target dates are summarized in the following table. These dates may change pending progress of site access agreements and weather.

RI/FS Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 <sup>th</sup> of every month
Secure Site Access	Fall 2017
Supplemental RI Field Work	Fall 2017
RI Groundwater Monitoring	Quarterly (new groundwater monitoring wells to be sampled for the first time in Winter 2017 with site wide groundwater monitoring wells)
RI Report – Revision 0 to USEPA (assumes at least two groundwater monitoring events with new wells, assumed to be installed in Fall 2017)	Fall 2018

# NSG FORMER MGP SITES | 2017 ANNUAL PROGRESS REPORT AND MASTER SCHEDULE UPDATE | 4 PROPOSED MASTER SCHEDULE

RI/FS Task/Deliverable	Target Date for Completion
RI Report – Revision 1 to USEPA	
(USEPA comments of RI Report – Revision 0 late	Winter 2019
Fall/early winter 2018)	
Alternatives Array Tech Memo to USEPA	Spring 2019
FS Report – Revision 0 to USEPA (assumes USEPA	
comments on Alternatives Array Tech Memo received	Summer 2019
Spring 2019)	
FS Report – Revision 1 to USEPA	Fall 2019
(USEPA comments of FS Report – Revision 0 Fall 2019)	1 dii 2019
USEPA issues ROD	Summer 2020
(assumes FS approved Winter 2019)	Julilliei 2020
On-going Post RI Groundwater Monitoring	To be determined following review of RI Data

#### **REFERENCES**

2007 July 23, United States Environmental Protection Agency and North Shore Gas Company, Settlement Agreement and Administrative Order on Consent for the conduct of Remedial Investigations and Feasibility Studies at the North Shore Gas Sites in Waukegan, Illinois. U.S. EPA Region 5, CERCLA Docket No. V-W-07-C-877.

2007(a) August 2. Revision 2, Multi-Site Health and Safety Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys.

2007(b) August 5. Revision 0, Generalized Conceptual Site Model, for Former Manufactured Gas Plant Sites, prepared for Integrys.

2007(c) September 4. Revision 2, Multi-Site Quality Assurance Project Plan, for Former Manufactured Gas Plant Sites, prepared for Integrys.

2007(d) September 5. Revision 2, Exponent, Multi-Site Risk Assessment Framework, for Former Manufactured Gas Plant Sites.

2008(a) September 8. Revision 4, Multi-Site Field Sampling Plan, for Former Manufactured Gas Plant Sites.

2008(b) September 12. Burns and McDonnell, Site-Specific Work Plan, Former South Plant Site, Waukegan, Illinois.

2008(c) December 26. Burns and McDonnell, Site-Specific Work Plan, Former North Plant Site, Waukegan, Illinois.

2009(a) July 16. Revision 0. Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.

2009(b) July 23. Burns and McDonnell, July 2009 Annual Progress Report, South Plant Site and North Plant Site, Waukegan, Lake County, Illinois, North Shore Gas Company, CERCLA Docket No. V-W-'07-C-877

2010(a) January 6, 2010. United States Environmental Protection Agency. Comments North Plant SSWP – Revision 0, Waukegan Former North Plant MGP Site, Waukegan, Illinois, North Shore Gas Company CERCLA Docket No. V-W-'07-C-877, CERCLIS ID – ILD984807990.

2010(b) February 18, 2010. Natural Resource Technology, Inc. Review of Monitoring Well Sampling Parameters and Strategy Technical Memorandum, Waukegan Former South Plant MGP Site, Waukegan, Illinois, North Shore Gas Company CERCLA Docket No. V-W-'07-C-877, CERCLIS ID – ILD984809228.

2010(c) March 8. United States Environmental Protection Agency. Comments on Review of Monitoring Well Sampling Parameters and Strategy Technical Memorandum, Waukegan Former South Plant MGP Site, Waukegan, Illinois, North Shore Gas Company CERCLA Docket No. V-W-'07-C-877, CERCLIS ID – ILD984809228.

2010(d) March 17. United States Environmental Protection Agency. Comments on Revision 0 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.

2010(e) March 25, 2010. Natural Resource Technology, Inc. Sediment Borings and Surface Water Sampling Technical Memorandum, Waukegan Former South Plant MGP Site, Waukegan, Illinois, North Shore Gas Company CERCLA Docket No. V-W-'07-C-877, CECLIS ID – ILD984809228.

2010(f) March 26. Revision 1. Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.

2010(g) April 20. United States Environmental Protection Agency. Approval of Revision 1 Multi-Site Feasibility Study Support Documents, for Former Manufactured Gas Plant Sites, prepared for Integrys.

2010(h) April 25, 2010. Natural Resource Technology, Inc. Response to USEPA Comments on Review of Monitoring Well Sampling Parameters and Strategy Technical Memorandum, Waukegan Former South Plant MGP Site, Waukegan, Illinois, North Shore Gas Company CERCLA Docket No. V-W-'07-C-877, CERCLIS ID – ILD984809228.

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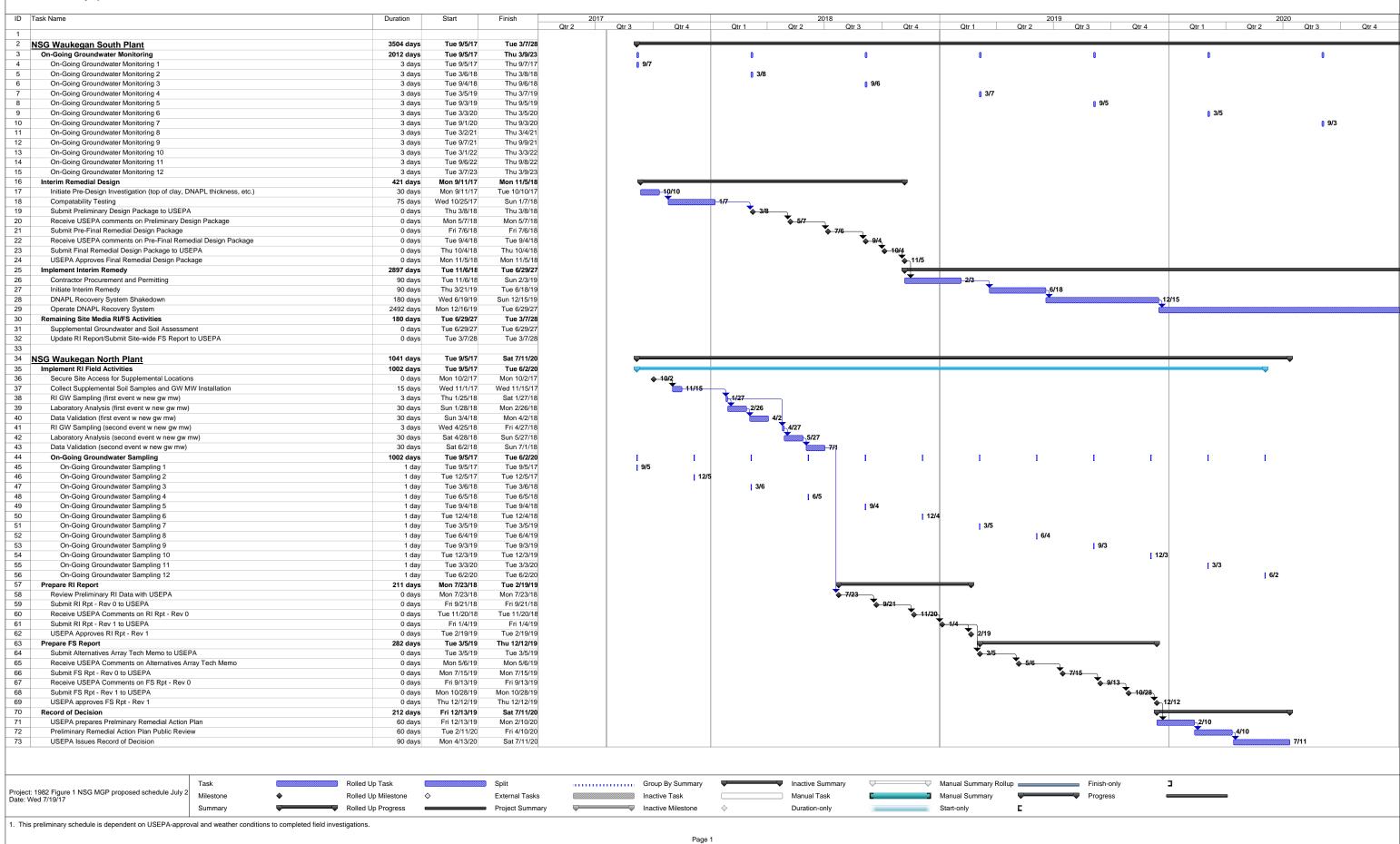
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## **Figures**

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North Shore Gas Company Former Manufactured Gas Plant Sites





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THERE'S A WAY

